

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:** § **Chapter 11**  
§  
**FIELDWOOD ENERGY III LLC, et al.,** § **Case No. 20-33948 (MI)**  
§  
§ **(Jointly Administered)**  
§  
**Post-Effective Date Debtors.<sup>1</sup>** §

**CERTIFICATE OF NO OBJECTION TO PLAN ADMINISTRATOR'S ELEVENTH  
OMNIBUS OBJECTION TO PROOFS OF CLAIM PURSUANT TO SECTION  
502(b) OF THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL  
RULES OF BANKRUPTCY PROCEDURE (EQUITY INTERESTS)**  
(Related Docket No. 2486)

The undersigned hereby certifies as follows:

1. On June 1, 2022, the *Plan Administrator's Eleventh Omnibus Objection To Proofs Of Claim Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure* [Docket No. 2486] (the "Objection") was filed with the Court by the administrator of the chapter 11 plan of the above-captioned post-effective date debtors.

2. Responses, if any, to the Objection were required to have been filed with the Court on or before July 1, 2022 (the "Response Deadline").

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

3. The Response Deadline has passed and no responsive pleading to the Objection has appeared on the Court's docket in the above-captioned chapter 11 cases or was served upon the undersigned counsel. Accordingly, the undersigned respectfully requests that the form of Order granting the Objection attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: July 5, 2022

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

Benjamin L. Wallen, Esq.

(TX Bar No. 24102623)

**PACHULSKI STANG ZIEHL &  
JONES LLP**

440 Louisiana Street

Houston, TX 77002

Telephone: (713) 691-9385

Facsimile: (713) 691-9401

Email: mwarner@pszjlaw.com

bwallen@pszjlaw.com

- and -

Kristopher M. Hansen (admitted *pro hac vice*)

Kenneth Pasquale (admitted *pro hac vice*)

Gabriel Sasson (admitted *pro hac vice*)

John F. Iaffaldano (admitted *pro hac vice*)

**PAUL HASTINGS LLP**

200 Park Avenue

New York, NY 10166

Tel: (212) 318-6000

Email: krishansen@paulhastings.com

kenpasquale@paulhastings.com

gabesasson@paulhastings.com

jackiaffaldano@paulhastings.com

*Counsel for the Plan Administrator*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of July, 2022, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner  
Michael D. Warner, Esq.